

WILKERSON ♦ BRYAN

WILKERSON & BRYAN, P.C.
ATTORNEYS & COUNSELORS

405 SOUTH HULL STREET
MONTGOMERY, ALABAMA 36104
TEL. 334.265.1500

MAILING ADDRESS
POST OFFICE BOX 830
36101-0830
FAX 334.265.0319

DANA H. BILLINGSLEY

dana@wilkersonbryan.com

February 4, 2013

Via Electronic Comment Filing System

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

**Re: Castleberry Telephone Company, Inc.'s Annual 47 C.F.R. § 64.2009(e)
Customer Proprietary Network Information (CPNI) Compliance
Certification for Calendar Year 2012
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Castleberry Telephone Company, Inc. ("Castleberry"), please find attached the annual CPNI Compliance Certification for Castleberry for the year 2012 in EB Docket No. 06-36, which has been filed electronically via the Federal Communications Commission's Electronic Comment Filing System on this date.

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.



Dana H. Billingsley
Attorney for Castleberry Telephone Company, Inc.
Wilkerson & Bryan, P.C.
405 South Hull Street
Montgomery, Alabama 36104
Telephone: (334) 265-1500
Facsimile: (334) 265-0319
Email: dana@wilkersonbryan.com

Enclosure

cc: Homer Holland

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012

Date filed: February 4, 2013

Name of company covered by this certification: Castleberry Telephone Co., Inc.

Form 499 Filer ID: 805914

Name of signatory: Homer Holland

Title of signatory: Secretary/Treasurer

In response to the Federal Communication Commission's ("Commission") rules and policies, Castleberry Telephone Co., Inc. states as follows:

I, Homer Holland, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, as set forth in 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules, including those mandating the adoption of CPNI procedures, training, recordkeeping and supervisory review.

The company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.C. Code and may subject it to enforcement action.

Signed 

**Before the
Federal Communications Commission
Washington, D.C. 20554**

**ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT
OF
CASTLEBERRY TELEPHONE CO., INC.
EB Docket No. 06-36**

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Castleberry Telephone Co., Inc. (hereinafter "Castleberry Telephone") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001, *et seq.* on behalf of Castleberry Telephone:

1. I have personal knowledge that Castleberry Telephone has implemented a system by which the status of a customer's Customer Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Castleberry Telephone obtains written approval for the use of its customers' CPNI and that Castleberry Telephone has notified its customers of their right to restrict Castleberry Telephone's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
3. I have personal knowledge that Castleberry Telephone has designated a CPNI Compliance Officer, who is responsible for supervising the use, disclosure, distribution or access to its customers' CPNI, that Castleberry Telephone has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001, *et seq.*, and that Castleberry Telephone has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Castleberry Telephone implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
5. I have personal knowledge that Castleberry Telephone maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Castleberry Telephone retains all such records for a minimum period of one (1) year.

6. I have personal knowledge that Castleberry Telephone has established a supervisory review process regarding Castleberry Telephone's compliance with outbound marketing situations and that Castleberry Telephone maintains records of such compliance for a minimum period of one (1) year. Castleberry Telephone's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

7. I have personal knowledge that Castleberry Telephone has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

On behalf of Castleberry Telephone, I represent and warrant that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject Castleberry Telephone to enforcement action.

Executed on this 4th day of February, 2013.

CASTLEBERRY TELEPHONE CO., INC.

By: Homer Holland

Printed: Homer Holland

As Its: Secretary / Treasurer